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8 Attorney for Defendant Josef F. Boehm

9  
10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE DISTRICT OF ALASKA

12 SALLY PURSER, )  
13 Plaintiff, ) TRIAL BRIEF  
14 v. )  
15 JOSEF F. BOEHM, BAMBI TYREE, )  
16 LESLIE J. WILLIAMS, JR., and )  
17 ALLEN K. BOLLING, )  
18 Defendant. )  
19 ) CASE NO.: A05-0085 (JKS)  
20 \_\_\_\_\_)

21 I. INTRODUCTION

22 Plaintiff seeks compensation for damages she alleges were  
23 caused by Defendant Boehm and others. She has placed her claimed  
24 psychological and physiological damages at the fore front of this  
25 litigation and demands compensation in excess of five million  
dollars for her perceived problems.

26 Plaintiff's Amended Complaint for damages sets forth  
27 allegations requiring discovery of Purser's claims. Purser alleges  
28 that Boehm was:

1. responsible for Purser's "addicted to drugs" paragraph 12;

1 and

2. controlled her through "severe psychological coercion" paragraph  
12.

3 Plaintiff's cause of action for intentional infliction of  
4 Emotional Distress places her mental, emotional and physical  
5 condition at issue as follows:

6 "...all of which had a mentally debilitating effect on the  
7 Plaintiff, leaving her confused, demoralized and unable to  
clearly think or reason." paragraph 36;

8 "...intended to undermine and eventually completely  
9 destroyed the plaintiff's self-respect, self-esteem and the  
10 concept of self and self-worth so the plaintiff could be  
controlled by the defendants." paragraph 37;

11 "The defendants conduct did, in fact, cause the plaintiff  
extreme mental and emotional distress and anguish, and  
physical harm resulting from the emotional distress." paragraph 40;

14 II. PLAINTIFF'S EXPERT REPORT AND PSYCHOLOGICAL EVALUATION IS  
15 COMPROMISED BY PURSER'S LACK OF CANDOR AND FAILURE TO PROVIDE  
16 MANY RELEVANT EVENTS.

17 Plaintiff's Expert Dr. Rose conducted a psychological  
evaluation of Plaintiff and prepared a report based on his  
18 findings.

19 Many of the events of Purser's life were withheld from Dr.  
Rose thus invalidating his findings as they relate to Defendant  
20 Boehm's alleged conduct. Missing are the myriad of individuals for  
21 whom Purser smoked "crack" cocaine with, obtained "crack" cocaine  
22 from, traded sex for money and drugs with as well as a detailed  
account of her involvement in several scams to defraud men of their  
23 money and property with co-conspirator Bambi Tyree. Dr. Rose did  
24 note a number of findings which place in issue which contribute  
25 to Plaintiff's psychological and physiological health:

- 26 1. Purser witnessed violence within her family, specifically her  
father beating her mother and choking her. *Dr. Rose report, page 1*
- 27 2. Purser was left at home alone at a young age. She drank beer  
28 with her mother who eventually became addicted to cocaine. *Dr. Rose*

1 Report, page 2  
2 3. Purser was physically assaulted by her mother who one time  
3 almost "snapped her back". Dr. Rose report, page 2  
4 4. Purser claimed that her adolescence was "fucked up because I  
4 was smoking dope and before that smoking weed, addiction runs  
5 really bad in my family." Dr. Rose Report, page 2  
6 5. Purser's uncle sexually abused her, made her go topless, took  
7 nude pictures of her and attempted to massage her on several  
7 occasions.<sup>1</sup> Dr. Rose Report, page 2  
8 6. Purser's mother "blackmailed her daily to get drugs". Dr. Rose  
9 Report, page 3  
10 7. Purser was psychiatrically hospitalized and reports a long  
10 family history of bi-polar disorder. Dr. Rose Report, page 4  
11 8. Purser has been prescribed zoloft, Prozac as well as  
12 antipsychotic medication for which she believes is ineffective. Dr.  
12 Rose Report, page 4  
13 9. Purser admits to suicide ideation seven years ago and  
14 attempted to cut her wrists with a pen. Dr. Rose Report, page 4  
15 10. Purser admits to becoming addicted to cocaine after a three  
16 month relationship with her boyfriend. When she took her first  
16 crack hit she had an "outer space feeling" and felt like "I could  
17 not get enough".<sup>2</sup> Dr. Rose Report, page 5  
18 11. Purser was expelled from school in 10<sup>th</sup> grade for selling  
19 XTC. She smoked heroin and snorted Oxy and Vicodin. Dr. Rose  
Report, page 5  
20 12. Purser was abused by several boyfriends and drug dealers. Dr.  
21 Rose Report, page 6  
22 13. Purser is currently on Federal probation for drug possession.  
22 Dr. Rose Report, page 7  
23  
24 Dr. Rose goes on to assess Purser's character traits, validity  
25 of complaints and personality type associated with her testing  
26 results.  
27 "...She is experiencing significant psychological problems,  
27 although she may be exaggerating her complaints...". Dr. Rose  
28 Report, page 8

1       Dr. Rose goes on to report that individuals with Purser's  
 2 clinical profile experience chronic psychological maladjustment.  
 3 *Dr. Rose Report, page 8*

4       In describing the characteristics associated with Purser's  
 5 clinical profile, Dr. Rose opines as follows *on page 8 of his*  
*report:*

- 6       1. They tend to manipulate others for their own gratification;
- 7       2. They rationalize their difficulties and blame others for their  
 problems;
- 8       3. They behave in a somewhat aloof, cold and callous and  
 uncompromising manner often attempting to advance themselves at the  
 expense of others;
- 9       4. They are addiction prone to drugs and alcohol.

10  
 11      III. SALLEY PURSER INTENTIONALLY AND HEEDLESSLY FAILED TO PROTECT  
 12 HER INTERESTS.  THUS HER ABILITY TO RECOVER DAMAGES SHOULD BE  
 13 MITIGATED.

14      Contributory negligence, assumption of risk, and incurred risk  
 15 do not apply to intentional torts. *McGill v. Duckworth*, 944 F.2d  
 16 344, 352 -353 (1991). However, a person is barred from recovery if  
 17 the injured person acted with knowledge of the danger and  
 18 intentionally or heedlessly failed to protect his own interests.  
 19 Restatement of Torts, § 918(2) (1939). *Whirl v. Kern*, 407 F.2d  
 20 781, \*798 (C.A.Tex. 1969).

21      Here, a large percentage of the damages claimed by Salley  
 22 Purser are attributable to her own intentional acts of self  
 23 gratification including but not limited to the following:

24      Purser obtained "crack" cocaine and other drugs from numerous  
 25 sources, including but not limited to Bambi Tyree, Kathleen Purser,  
 26 Al Bolling, Leslie Williams, Jay Whaley, Carl Bucher, Kathleen  
 27

1 Purser's various drug connections and numerous other individuals  
2 before, during and after the time period encompassing the alleged  
3 actions of Boehm. See *Purser Deposition, Purser Investigator*  
4 *Interview, Tina Arndt Declaration, Vince Blomfield Declaration,*  
5 *Erin Axt Deposition Testimony;*

7 Purser smoked "crack" cocaine with her mother Kathleen Purser,  
8 Bambi Tyree, Erin Axt, Carl Bucher, Al Bolling, Jay Whaley and  
9 numerous individuals before, during and after the time period  
10 encompassing the alleged actions of Boehm. See *Purser Deposition,*  
11 *Purser Investigator Interview, Tina Arndt Declaration, Vince*  
12 *Blomfield Declaration, Erin Axt Deposition Testimony;*  
13

14 Purser began smoking marijuana, snorting cocaine, using  
15 ecstasy, and drinking alcohol as early as 12 years old. See *Purser*  
16 *Deposition;*  
17

18 Purser was suspended from junior highschool for drugs,  
19 specifically ecstacy, prior to the time period encompassing the  
20 alleged actions of Boehm. See *Purser Deposition, Purser*  
21 *Investigator Statement;*  
22

23 Purser engaged in numerous acts of sex with older men and  
24 before, during and after the time period encompassing her claims  
25 against Boehm. See *Purser Deposition, Purser Investigator*  
26 *Statement, Tina Arndt Declaration, Vince Blomfield Declaration,*  
27

1 Purser Grand Jury Testimony, Erin Axt Deposition Testimony;

2 Purser traded sex for "crack" cocaine with numerous individuals,

3 including older men and drug dealers. In addition, Purser's mother sold

4 her to older men and drug dealers in exchange for "crack" cocaine.

5 Said acts occurred before, during and after the time period

6 encompassing her claims against Boehm. See *Purser Deposition, Purser*

7 *Investigator Interview, Tina Arndt Declaration;*

8 Purser, 16 years old, lived with Jay Whaley, an older man,

9 convicted drug dealer and escort service operator who paid for her

10 living expenses and provided her an unlimited source of "crack"

11 cocaine in exchange for sex during the time period encompassing her

12 claims against Boehm. See *Purser Deposition, Purser Investigator*

13 *Interview*

14 Bambi Tyree with the assistance of Sally Purser and others

15 with whom she was involved engaged in a plot to keep Mr. Boehm high

16 on "crack" cocaine to enable them to steal his property, cash, cars and

17 too seek to gain control over his financial resources. See *Purser*

18 *Investigator Statement, Purser Deposition, Tina Arndt Declaration,*

19 *Vince Blomfield Declaration, Erin Axt Deposition Testimony, Report*

20 *of Gary A. Jacobson, M.D.;*

21 Erin Axt's deposition taken on December 13, 2006, reveals that

22 Erin Axt first smoked "crack" cocaine with Sally Purser, provided by

23

24

1 Purser, while at Purser's home. Deposition of Erin Axt, Pages 15-17.  
2 In addition, Bambi Tyree provided "crack" cocaine to Erin Axt.  
3  
4 *Deposition of Erin Axt, Page 17.*

5  
6       Erin Axt first snorted powder cocaine with Sally Purser at Purser's  
7 home. She does not know where Purser obtained the cocaine. *Deposition*  
8 *of Erin Axt. Pages 26, lines 22-25, Page 27, Page 28, lines 1-5.*  
9  
10 Erin Axt would often smoke "crack" cocaine at Sally Purser's home  
11 with Sally and Kathleen Purser. *Deposition of Erin Axt, Page 51, lines*  
12 *2-21.*

13  
14       On one occasion Erin Axt testified that Bambi Tyree, Sally Purser  
15 and Erin Axt stole Boehm's Cadillac and took it for a joy ride.  
16 While driving they were smoking "crack" cocaine. They refused to  
17 give the car back to Boehm unless he gave them money. *Deposition of*  
18 *Erin Axt, Page 72, line 17 - page 74, line 14*  
19  
20

21 IV. PURSER'S MOTIVATION FOR MONEY HAS RESULTED IN A CHANGE OF  
22 TESTIMONY

23       Purser's motivation to acquire a financial benefit from Boehm is  
24 transparent and proven by her own contradictions. Even more  
25 revealing is the following excerpt taken from her December 12, 2006  
26 deposition:

27 Q. Now you have answered a number of questions this morning that I

1 asked you by saying that, for example, about Mr. Boehm being the  
2 victim of Ms. Tyree and Mr. Bolling and Mr. Williams, by saying that's  
3 what you believed when you said those things in 2004. But am I correct  
4 in assuming that you're saying you no longer feel that way?

5 A. No, I do not any longer feel that way.

6 Q. Between that time and now you have filed a civil  
7 complaint, is that correct?

8 A. Yes, that is correct.

9 Q. And that civil complaint is for damages for money, is  
10 that right?

11 A. Yes.

12 Q. Is the fact that you have filed a lawsuit for money  
13 making various allegations that are different than  
14 what you felt in 2004, the reason that you changed  
15 your feeling?

16 A. The reason I filed the civil suit is because my  
17 feelings changed.

18 See *Purser Deposition, page 89, 90*

19 DATED this 2nd day of July, 2007 at Anchorage, Alaska.

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